

MEMO ENDORSED

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September 28, 2021

VIA ECF

Hon. Ona T. Wang

Southern District of New York

500 Pearl St.

New York, NY 10007-1312

SO ORDERED:

Application GRANTED. The Initial Case Management Conference has been rescheduled to November 30, 2021 at 10:00 a.m. Extensions for deadlines are also GRANTED.



Ona T. Wang
Unites States Magistrate Judge

9/30/21

Re: Martinez v. Accelerant Media, LLC, et al.
No. 1:20-CV-09366-GBD-OTW

Dear Magistrate Judge Wang:

We represent Plaintiff Jamie Rio Martinez in the above-captioned action.

This Court's Initial Case Management Order, dated September 22, 2021 (ECF 35), scheduled the Initial Pretrial Conference pursuant to Rule 16(b) of the Federal Rules of Civil Procedure to take place on October 7, 2021.

Pursuant to Section I.E. of Your Honor's Individual Practices in Civil Cases, we respectfully request that the Court adjourn the Initial Pretrial Conference to November 11, 2021 or November 18, 2021, in light of Plaintiff's recent filing of the amended complaint for which Judge Daniels granted leave earlier this month. (ECF 33).

We also request extensions of the parties' deadline to confer under Rule 26(f) of the Federal Rules of Civil Procedure, which was September 16, 2021, and the deadline to submit a Proposed Case Management Plan, which is September 29, 2021. Therefore, Plaintiff also requests an extension of the deadline to confer under Rule 26(f) to 21 days before the adjourned Initial Pretrial Conference date, and an extension of the deadline to submit a Proposed Case Management Plan to one week before the adjourned Initial Pretrial Conference date.

Plaintiff has not previously requested an adjournment in this matter. We do not know the identity of counsel for the defendants. These defendants did not appear in response to the original complaint filed in this case.

Thank you for your consideration.

Respectfully submitted,

/s/ John B. Harris

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